



May 13, 2020

BY EMAIL AND ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The initial conference currently scheduled for May 18, 2020, is adjourned until July 20, 2020, at 10:30 AM. In addition, time shall be excluded until the date of the conference. SO ORDERED.

A handwritten signature in black ink, appearing to read 'Loretta A. Preska'.

5/14/2020

RE: ***United States v. Michael Latimer, et al., 20 Cr. 202 (VEC)***
United States v. Keith Lynch, S1 20 Cr. 202 (VEC)

Dear Judge Preska:

I represent the defendant, Justin Rivers, and submit this letter on behalf of all counsel for the codefendants and the government to jointly and respectfully request that the court conference currently scheduled for May 18, 2020 at 10:30 a.m., be adjourned for sixty days.

This is the second request for an adjournment of the initial pretrial conference. By way of background, on March 17, 2020 the defendants were indicted in the instant matter. The case was assigned to Your Honor and an initial pretrial conference was scheduled for March 31, 2020. At the request of all parties, this conference was adjourned by the Court to May 18, 2020. Thus there has been one prior request for an adjournment of the initial pretrial conference.

The reason for this request is that the parties are in the process of obtaining the discovery from the government so that it can be reviewed by counsel and the defendants.

The defendants consent to the exclusion of time under the Speedy Trial Act from today until the date of the next scheduled conference pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interest of the public and the defendants in a speedy trial are outweighed here by the interests of the defendants in having an opportunity to receive and review discovery and consider any possible pre-trial motions or pre-trial dispositions, an exclusion which we submit is also appropriate in light of the national emergency declared over the coronavirus pandemic.

Thank you for your consideration of this request.

Most Respectfully,

A handwritten signature in black ink, appearing to read 'Eric Franz'.

ERIC FRANZ